UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

))
) C.A. No. 13-CV-2576 (LGS) (SN)
DECLARATION OF DAMIAN R. CAVALERI, ESQ. IN SUPPORT OF
) PLAINTIFF'S COMBINED) DAUBERT MOTION
)

- I, Damian R. Cavaleri, Esq., declare as follows:
- 1. I am an attorney at the law firm Hoguet Newman Regal & Kenney, LLP, counsel for International Cards Company, Ltd. ("ICC"), plaintiff in the above-captioned matter. I submit this declaration in support of ICC's combined *Daubert* motion.
- 2. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Report of Kaushik Gopal, dated February 18, 2015.
- 3. Attached hereto as Exhibit 2 is a true and correct copy of Exhibit A to the Expert Report of Kaushik Gopal, dated February 18, 2015.
- 4. Attached hereto as Exhibit 3 is a true and correct copy of Exhibit B to the Expert Report of Kaushik Gopal, dated February 18, 2015.
- 5. Attached hereto as Exhibit 4 is a true and correct copy of the Expert Report of Anthony B. Creamer, dated February 18, 2015.
- 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the April 23, 2015 deposition of Kaushik Gopal.

7. Attached hereto as Exhibit 6 is a true and correct copy of Defendant MasterCard

International Inc.'s Initial Disclosures, dated September 27, 2013.

8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the

Alliance Agreement between MasterCard and Middle East Payment Services, Bates numbered

M0024069 through M0024098.

9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the May

1, 2015 deposition of Anthony Creamer.

Dated: June 30, 2016

Damian R. Cavaleri